

EXHIBIT C [Doc. 1-10]
(Redacted Exhibit to Complaint)



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May 29, 2024

Mr. Stephen E. Kabakoff
Miller & Martin, PLLC
1180 W. Peachtree St., NW, Ste 2100
Atlanta, GA 30309-7706

Via Email at stephen.kabakoff@millermartin.com and Deloris.Lanus@millermartin.com

Dear Mr. Kabkoff:

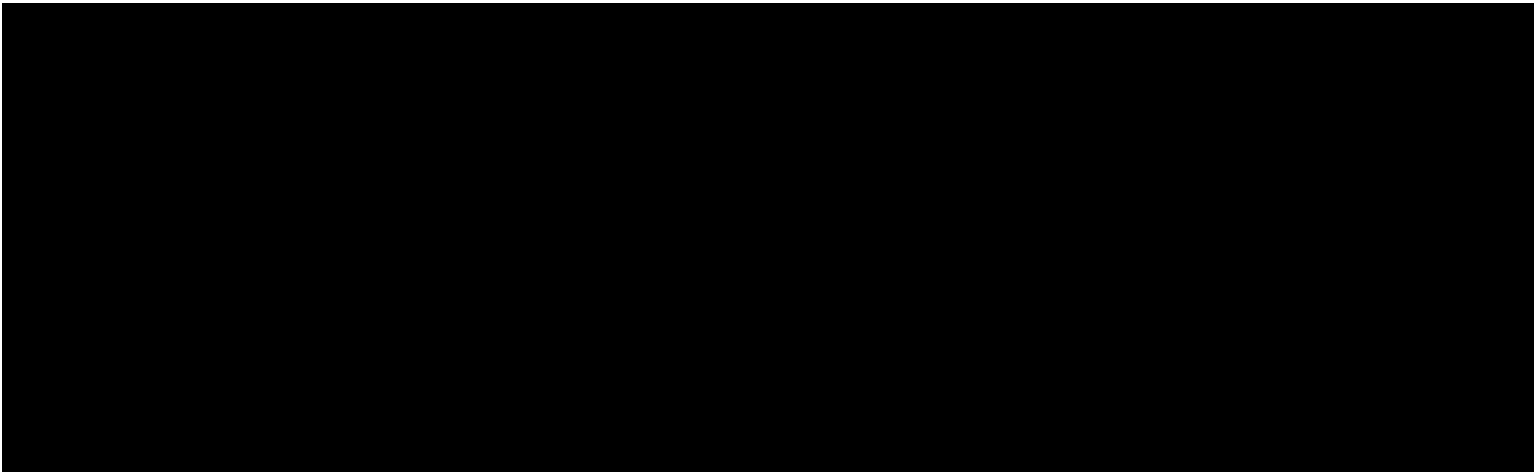
It is impossible to find any appropriate words to describe what John Holland is doing. That said, the very best approach forward is facts and truth, as truth is always the best offense and defense.

As an attorney, you are very aware of the importance of definitions, chronology of events, direct evidence, and then a common sense or plain language approach to understanding facts and subsequent management of issues. My management of the issues in the context of accurate definitions, truth, direct evidence, adopted building regulation law, and professional engineering law follows.

Definitions

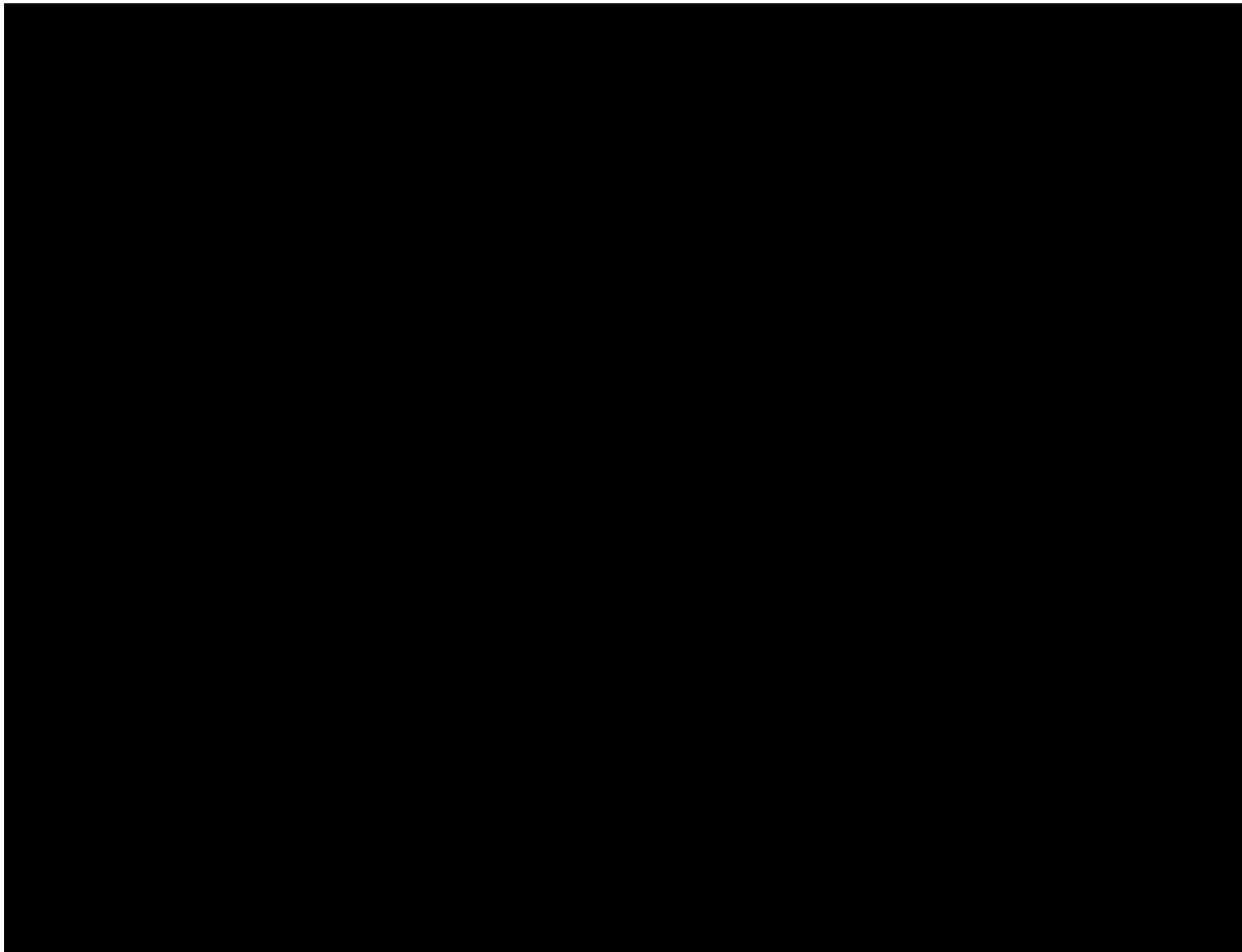
Legal Aspects of Business

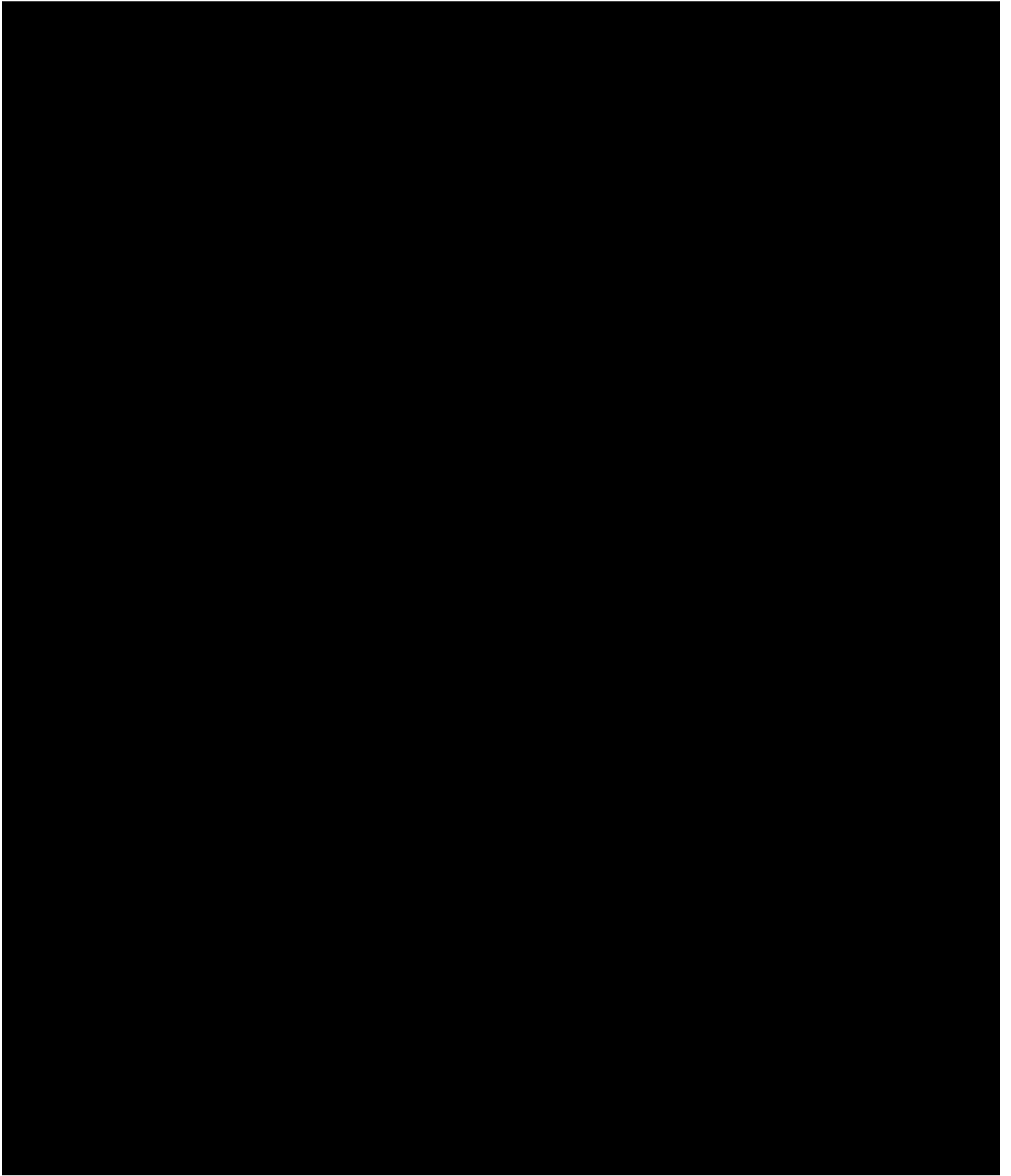
Copyright – Copyright refers to the legal right of the owner of intellectual property/creative work, which protects original works of authorship as soon as an author fixes the work in a tangible form of expression. In copyright law, there are a lot of different types of intellectual property/creative works, such as paintings, photographs, illustrations, construction details, engineering works, architectural plans, etc.

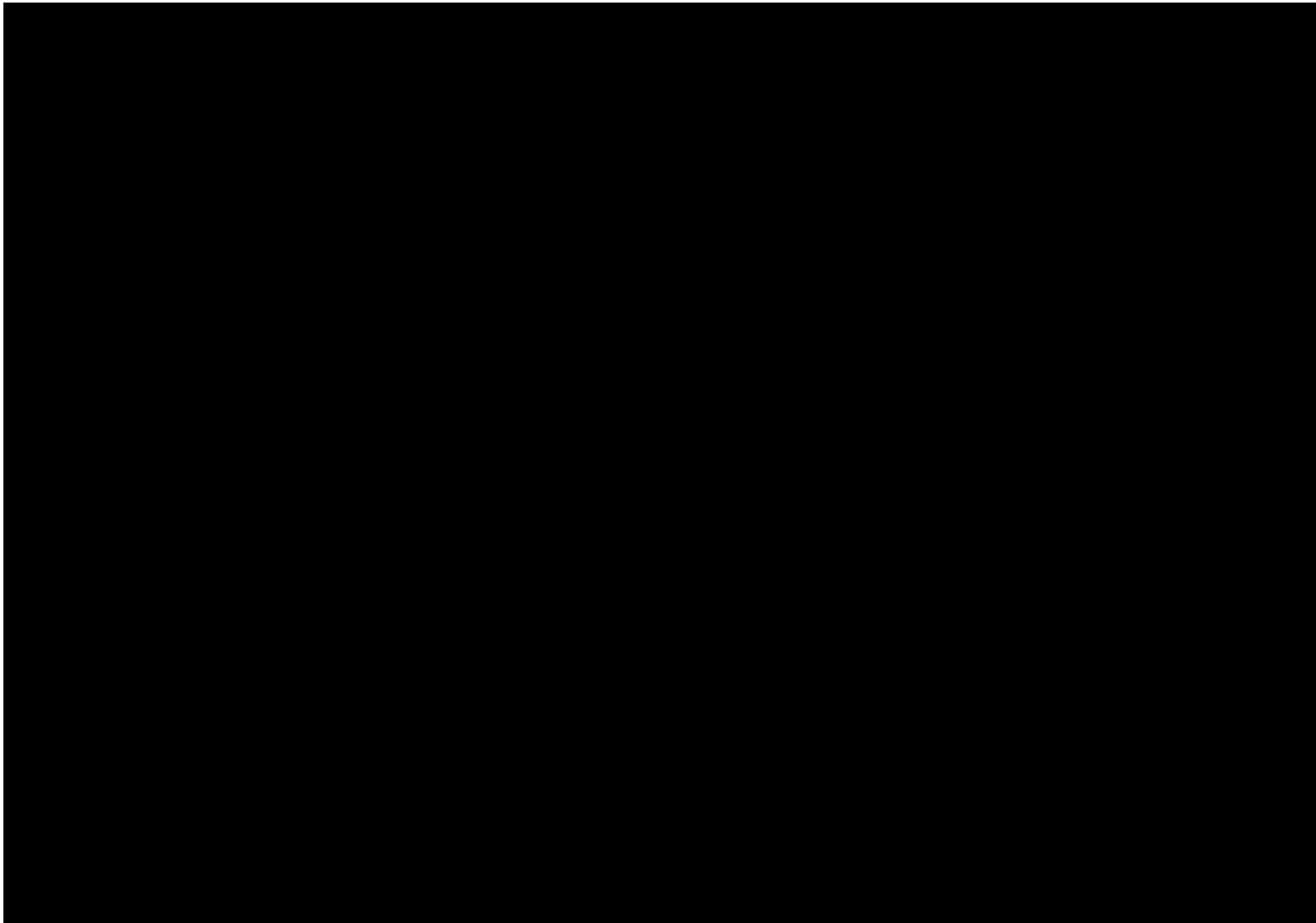
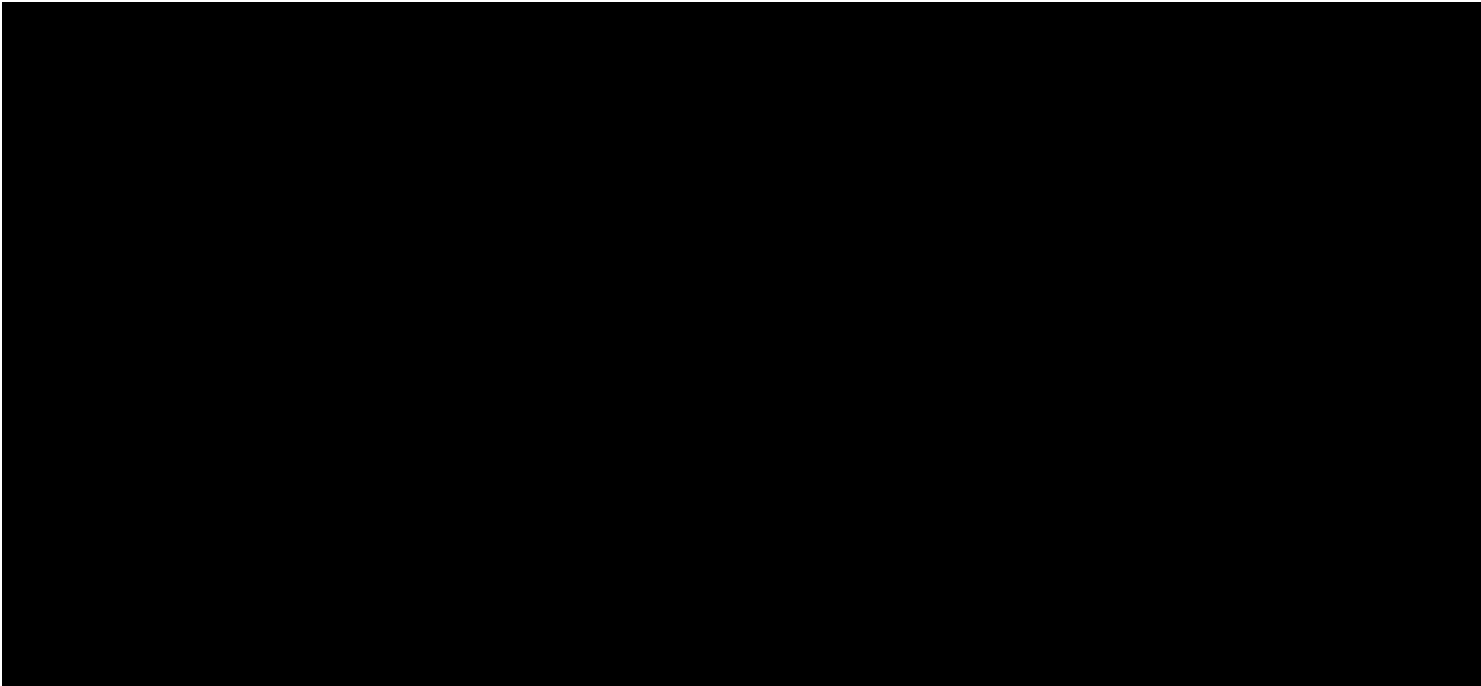


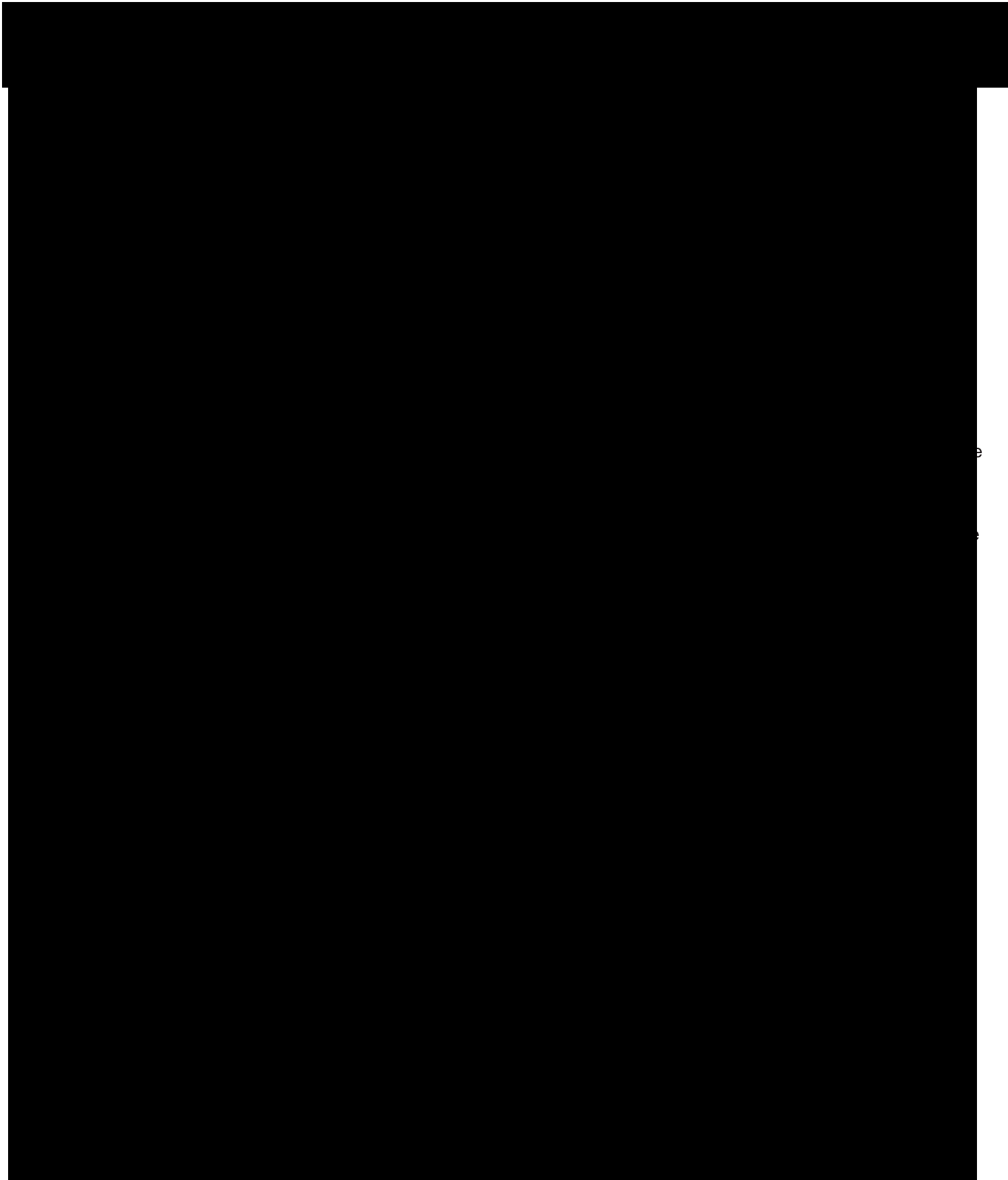
THE QUALTIM FAMILY OF SERVICES

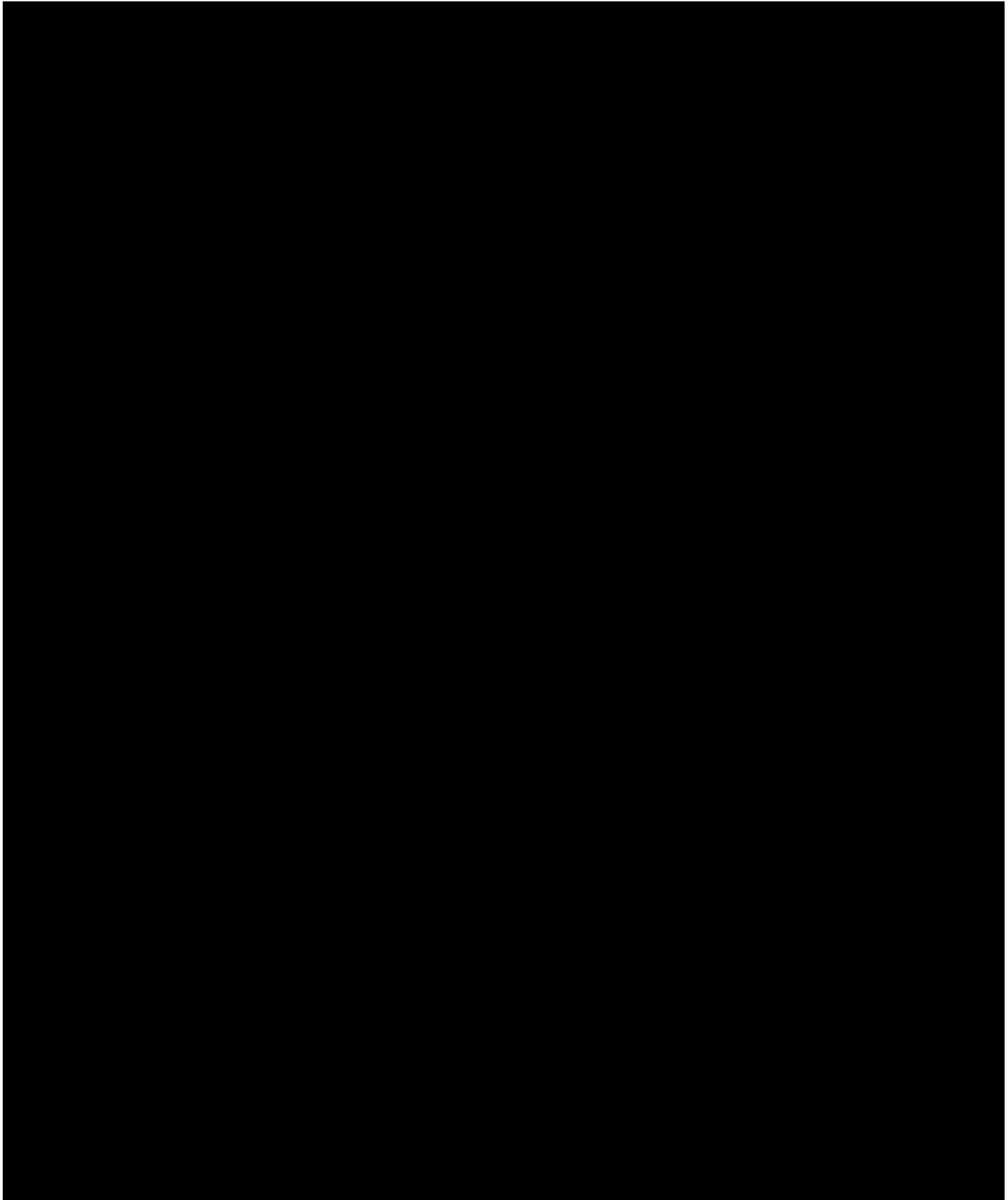
Where building innovation thrives.

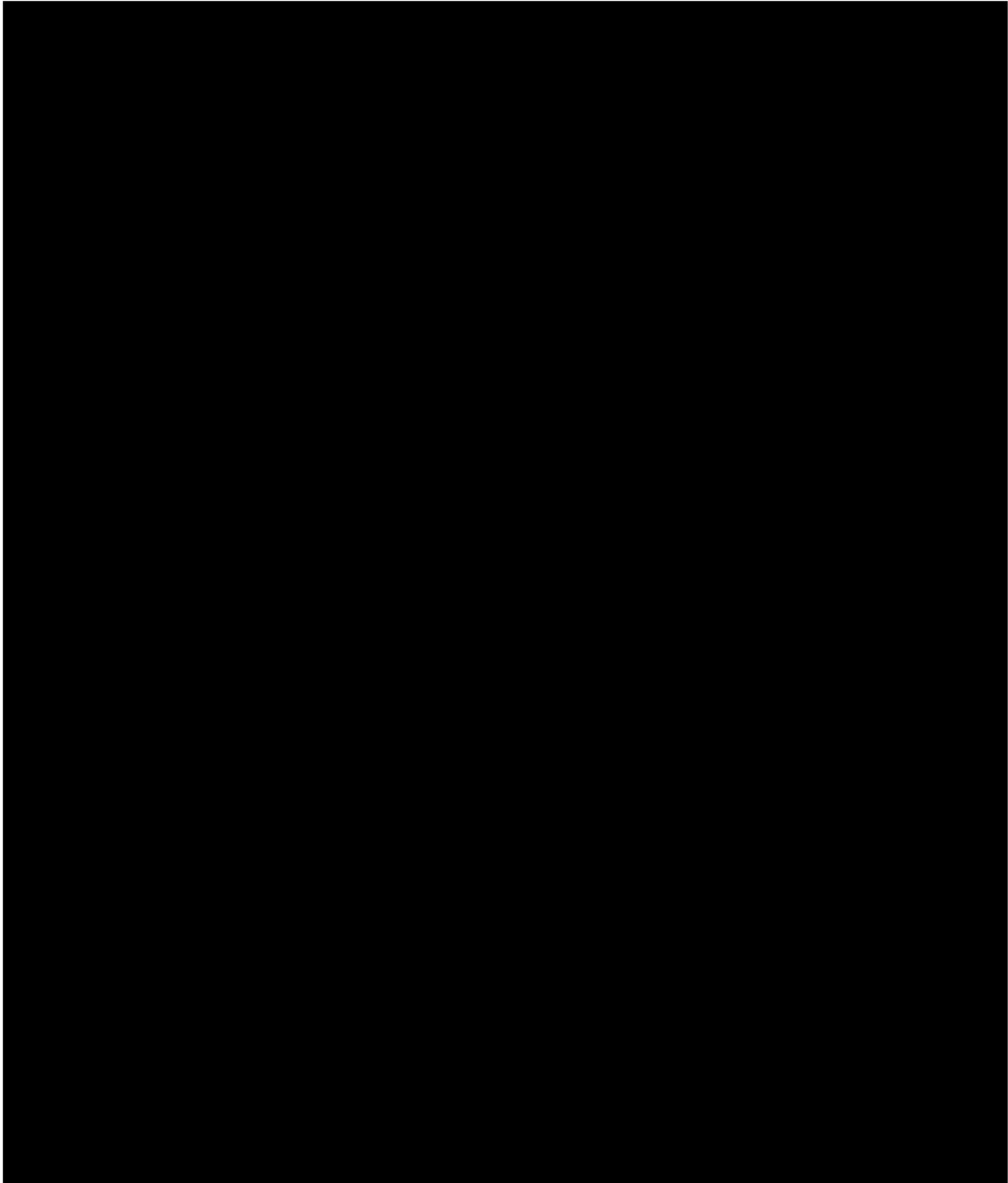


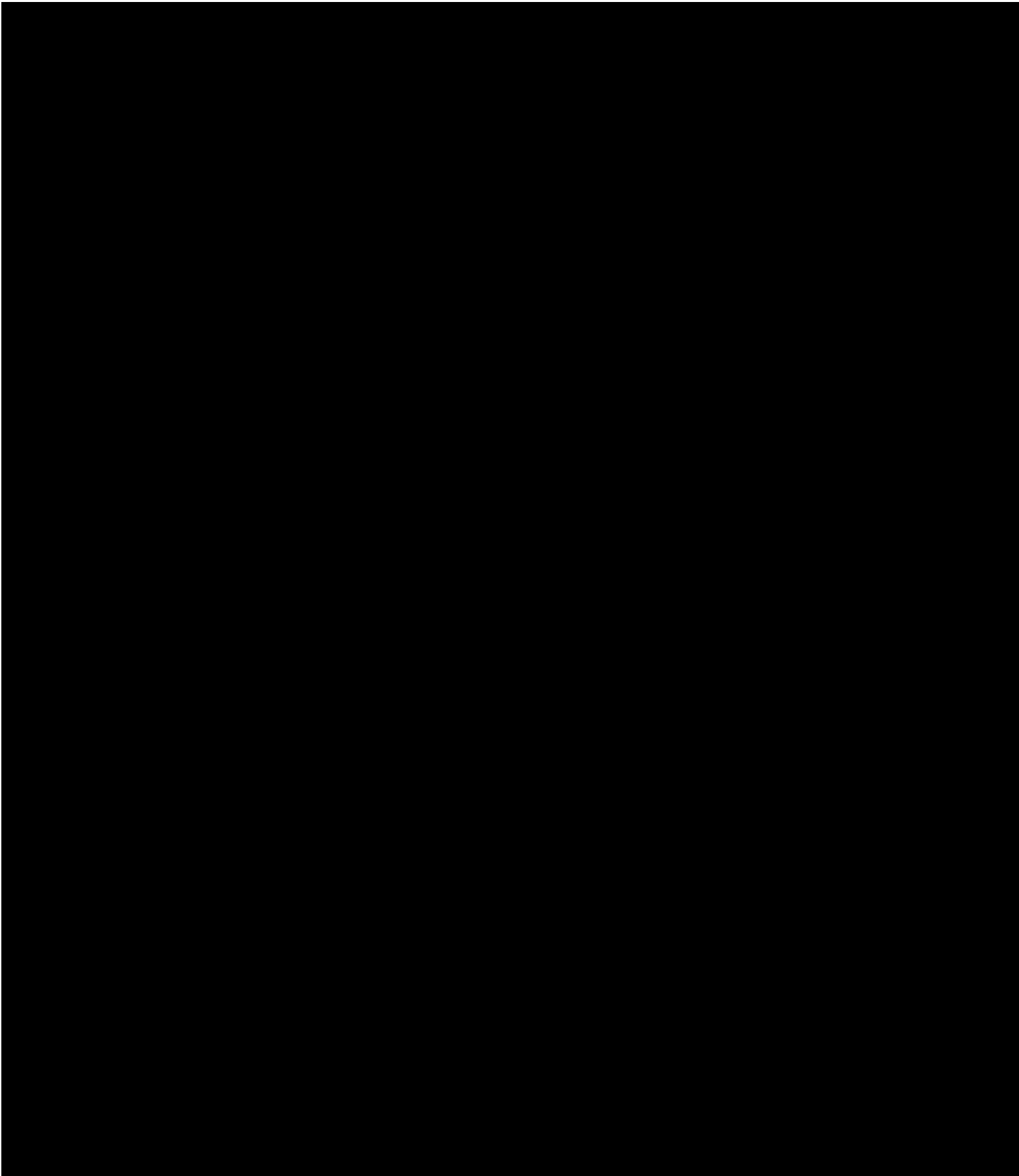


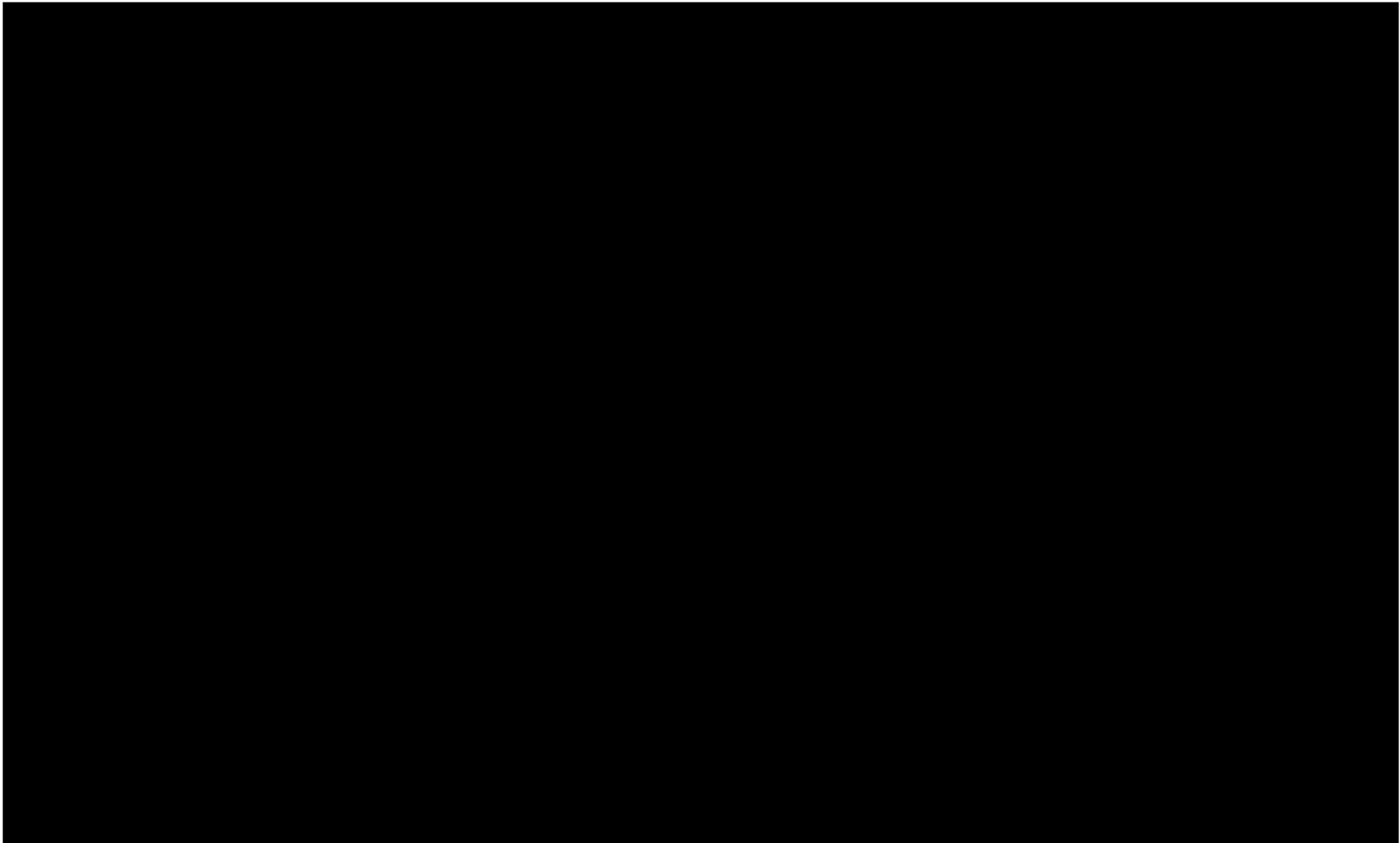
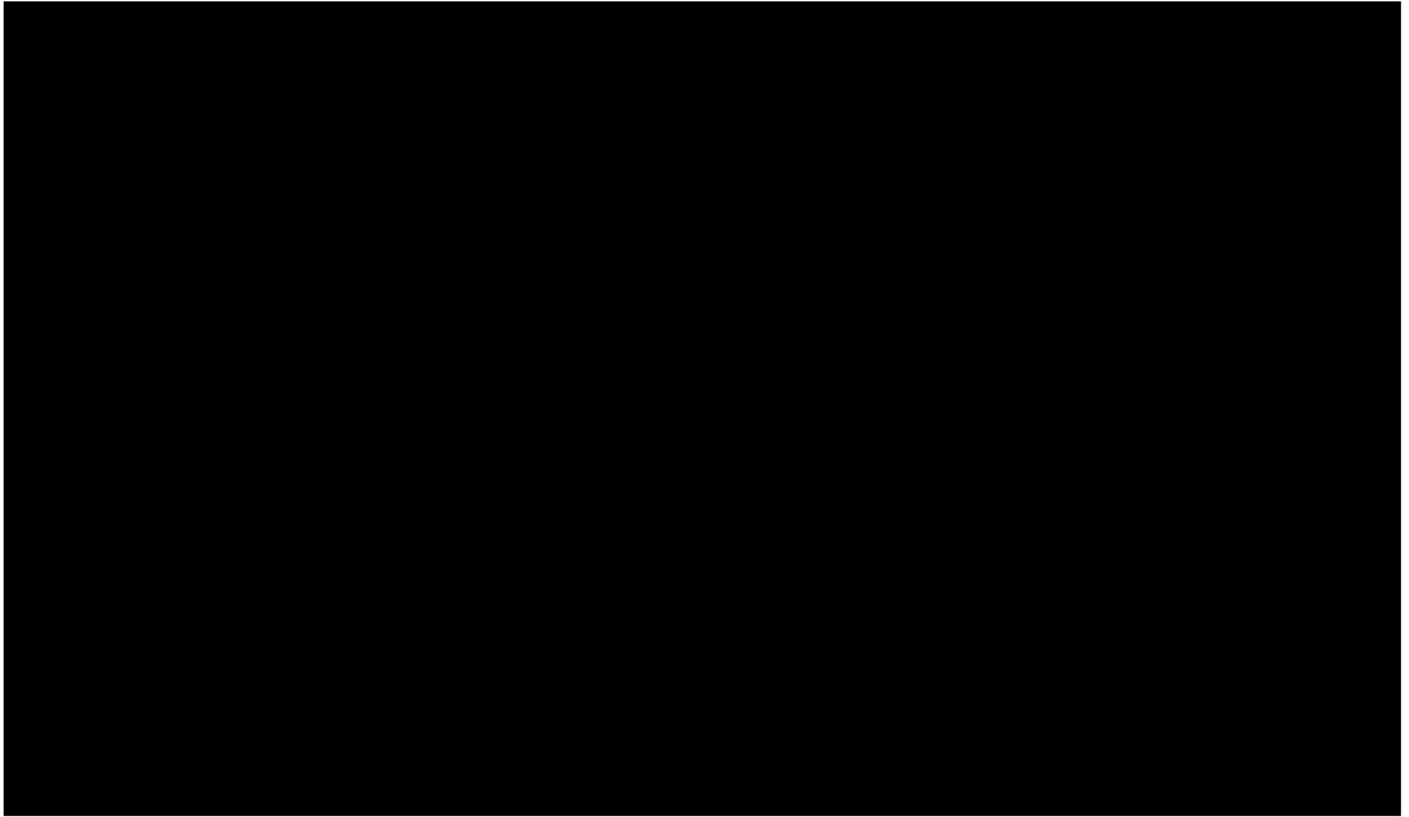


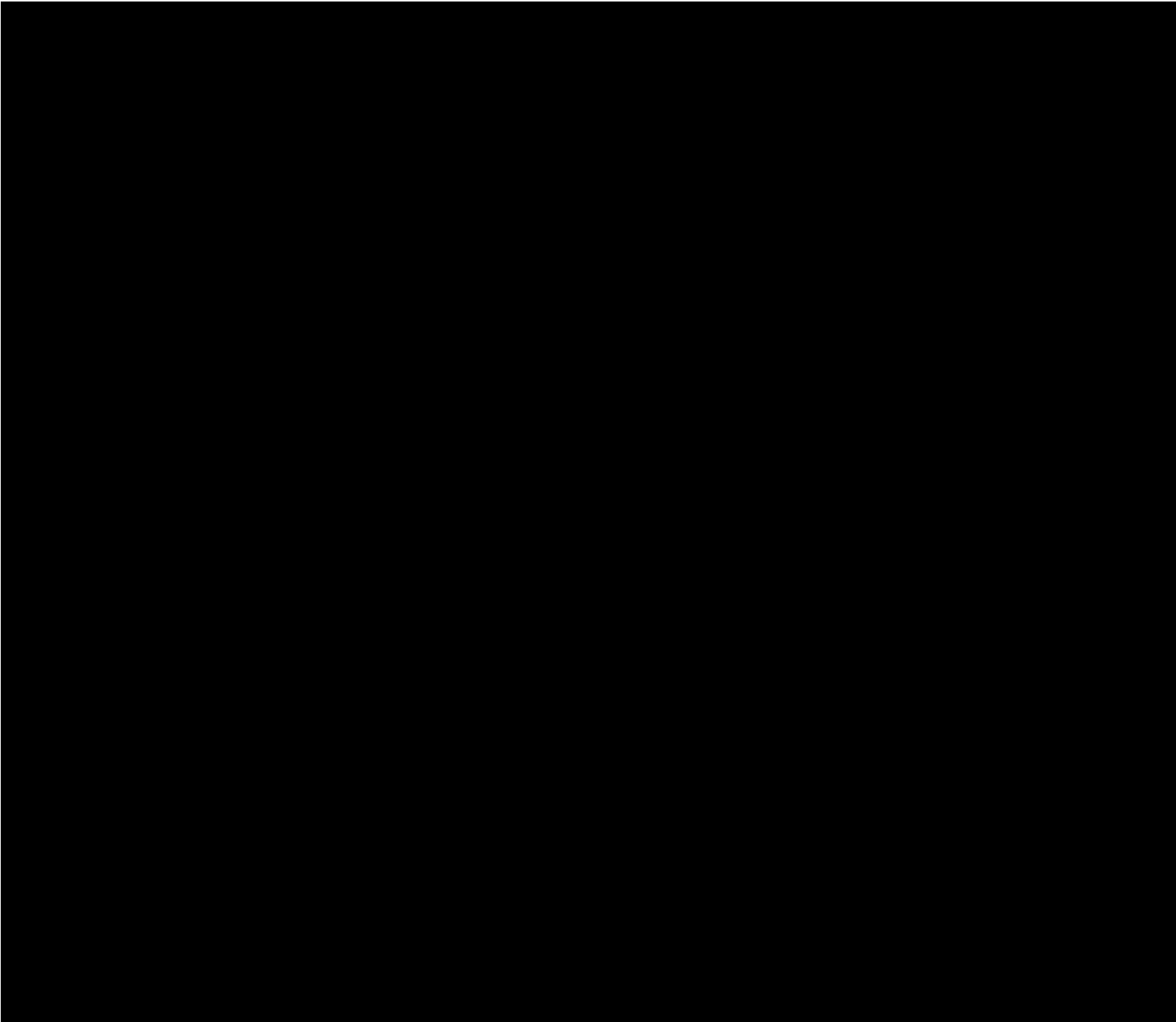




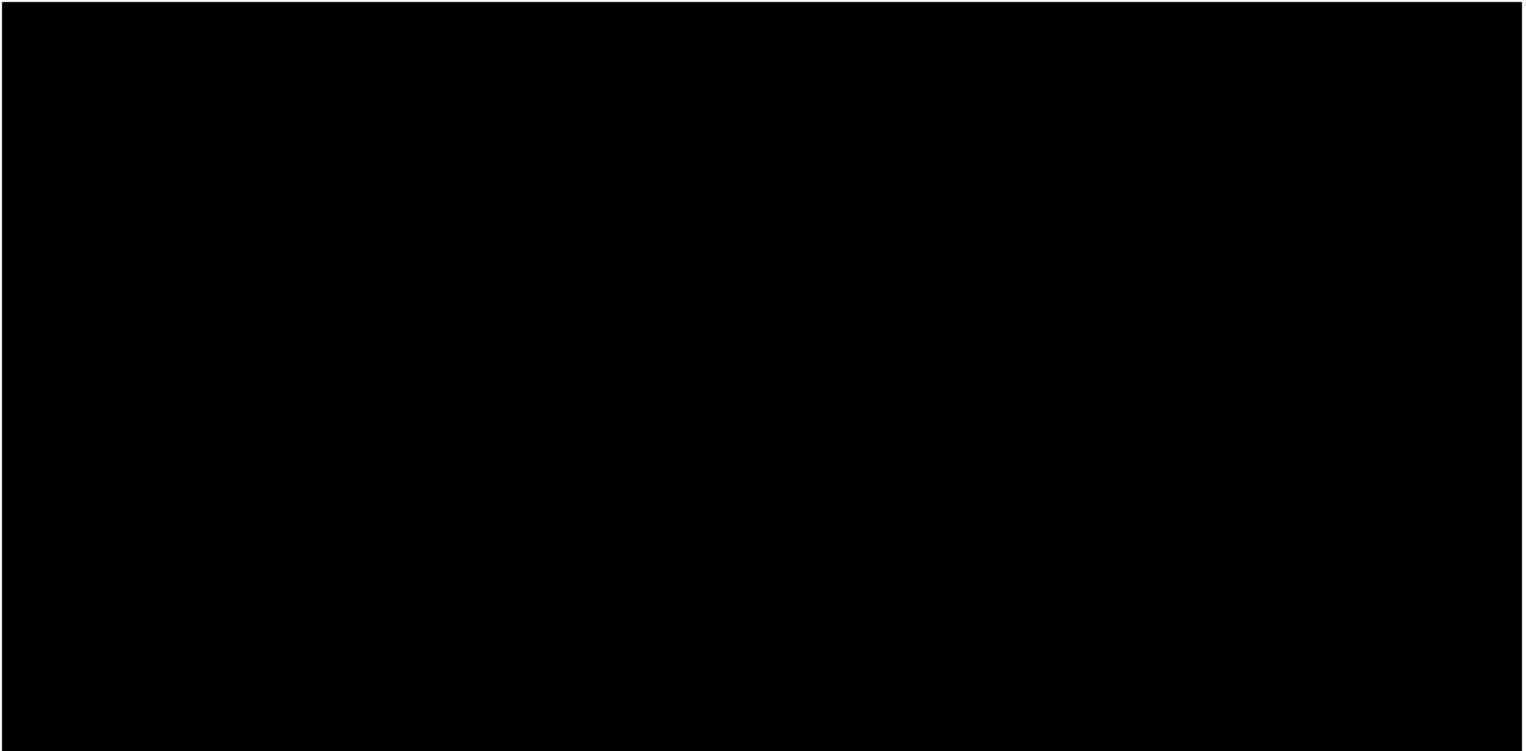
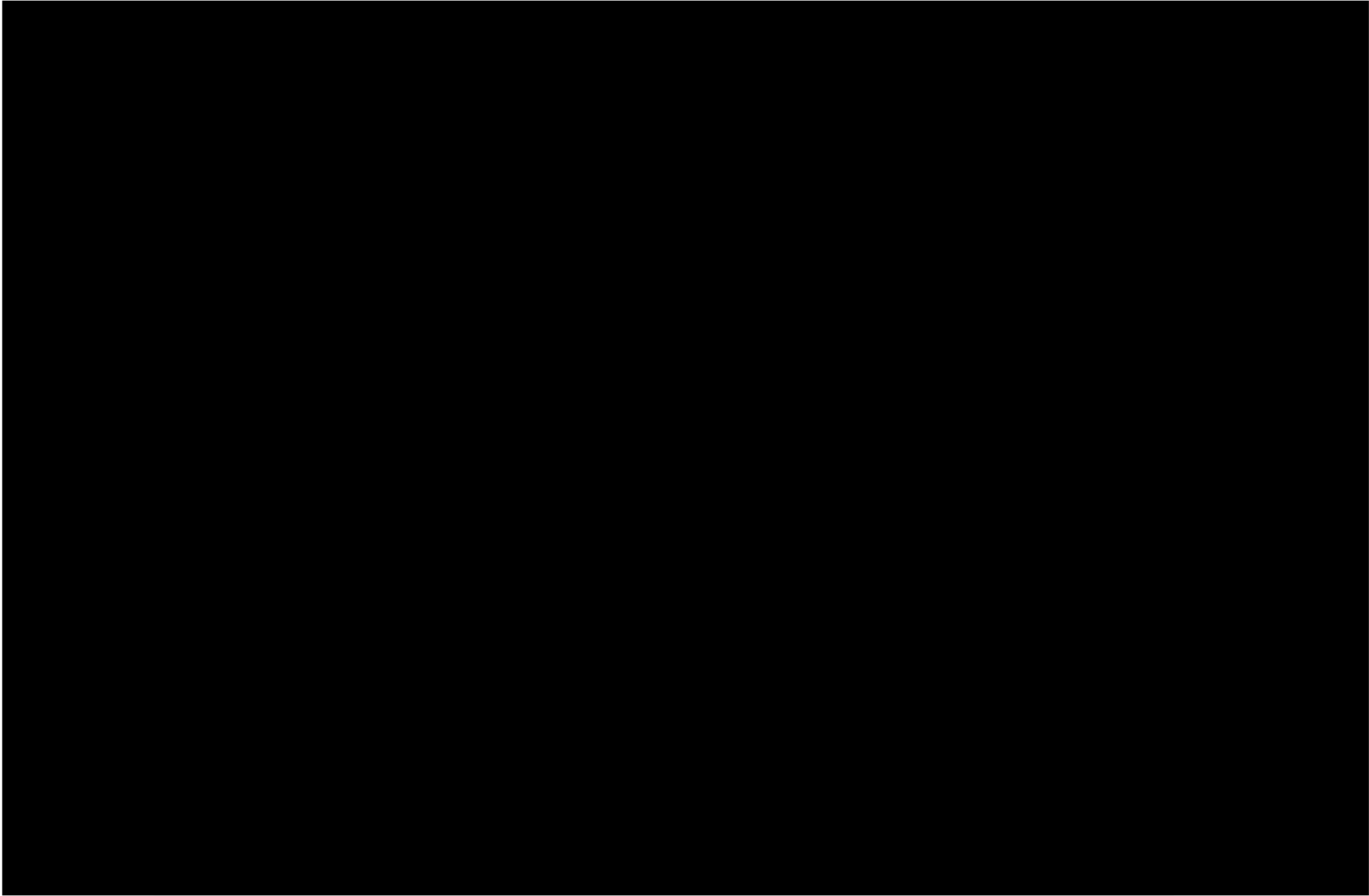


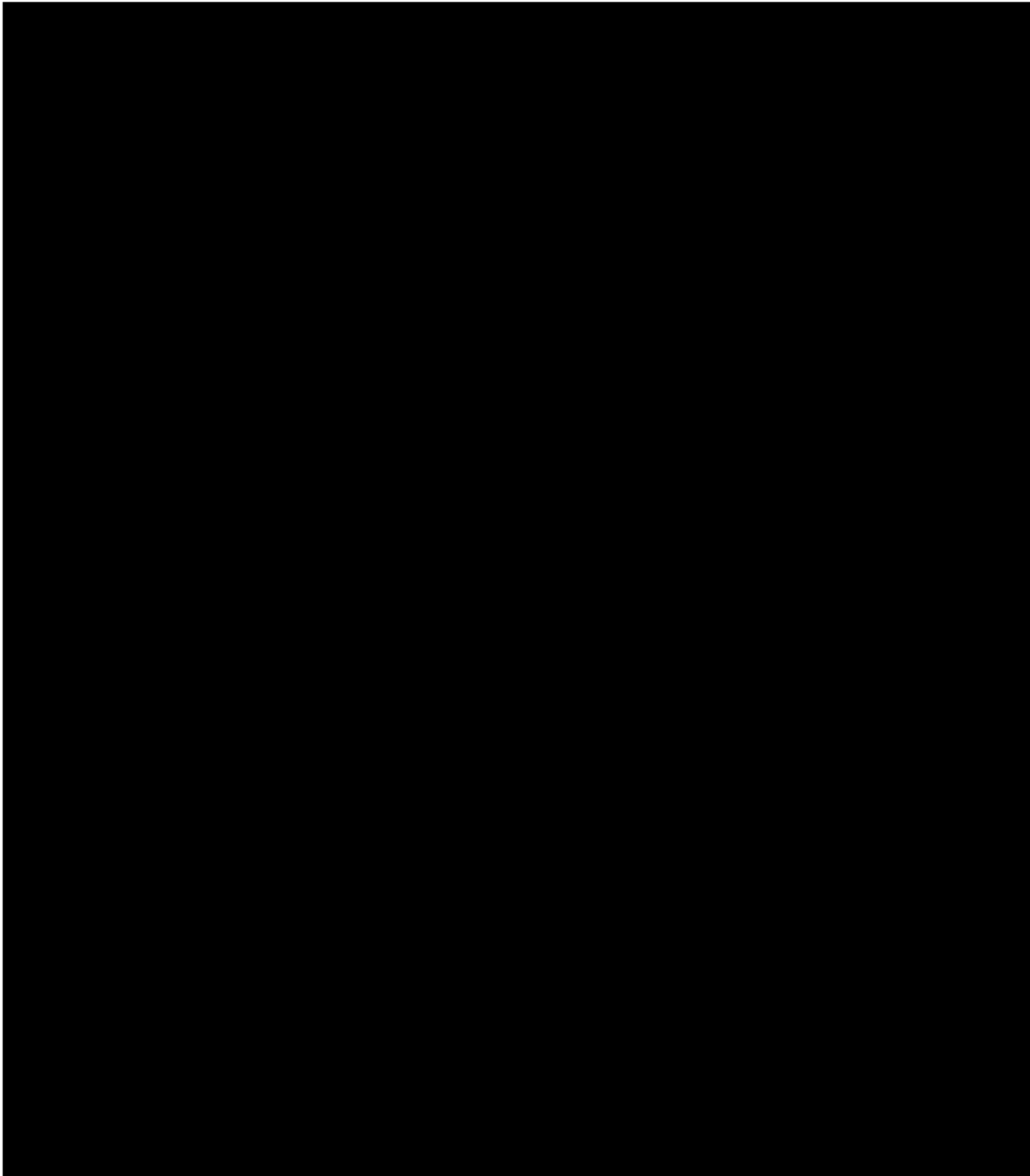


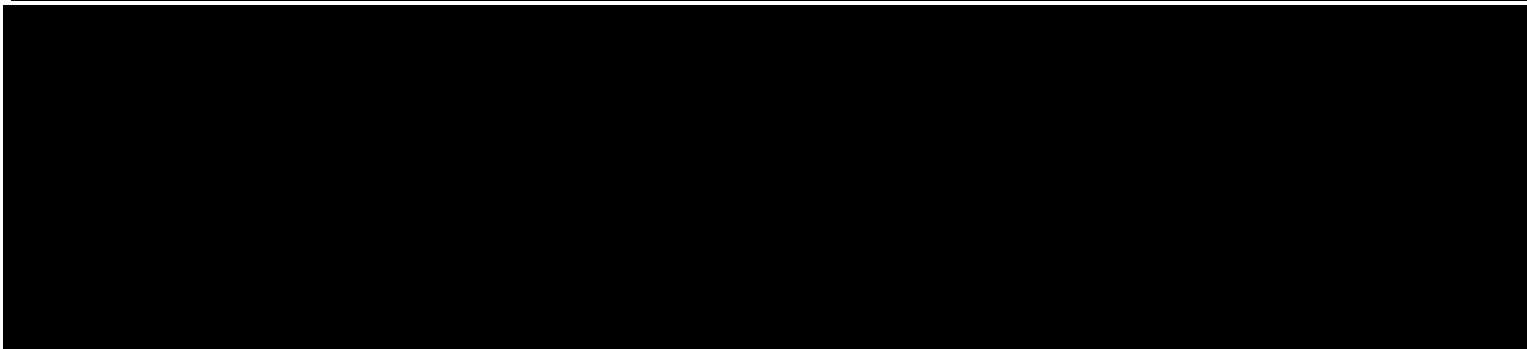
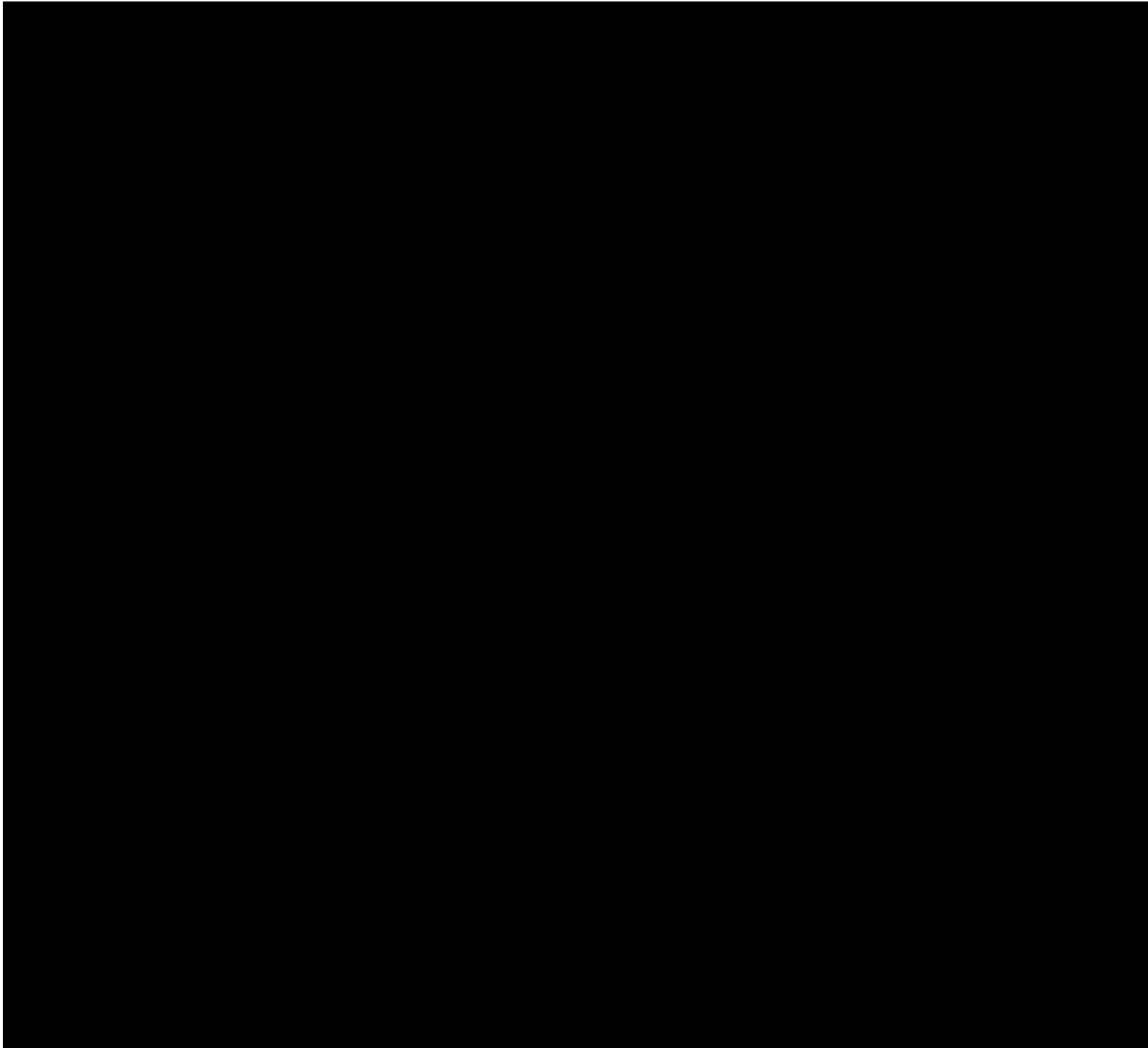


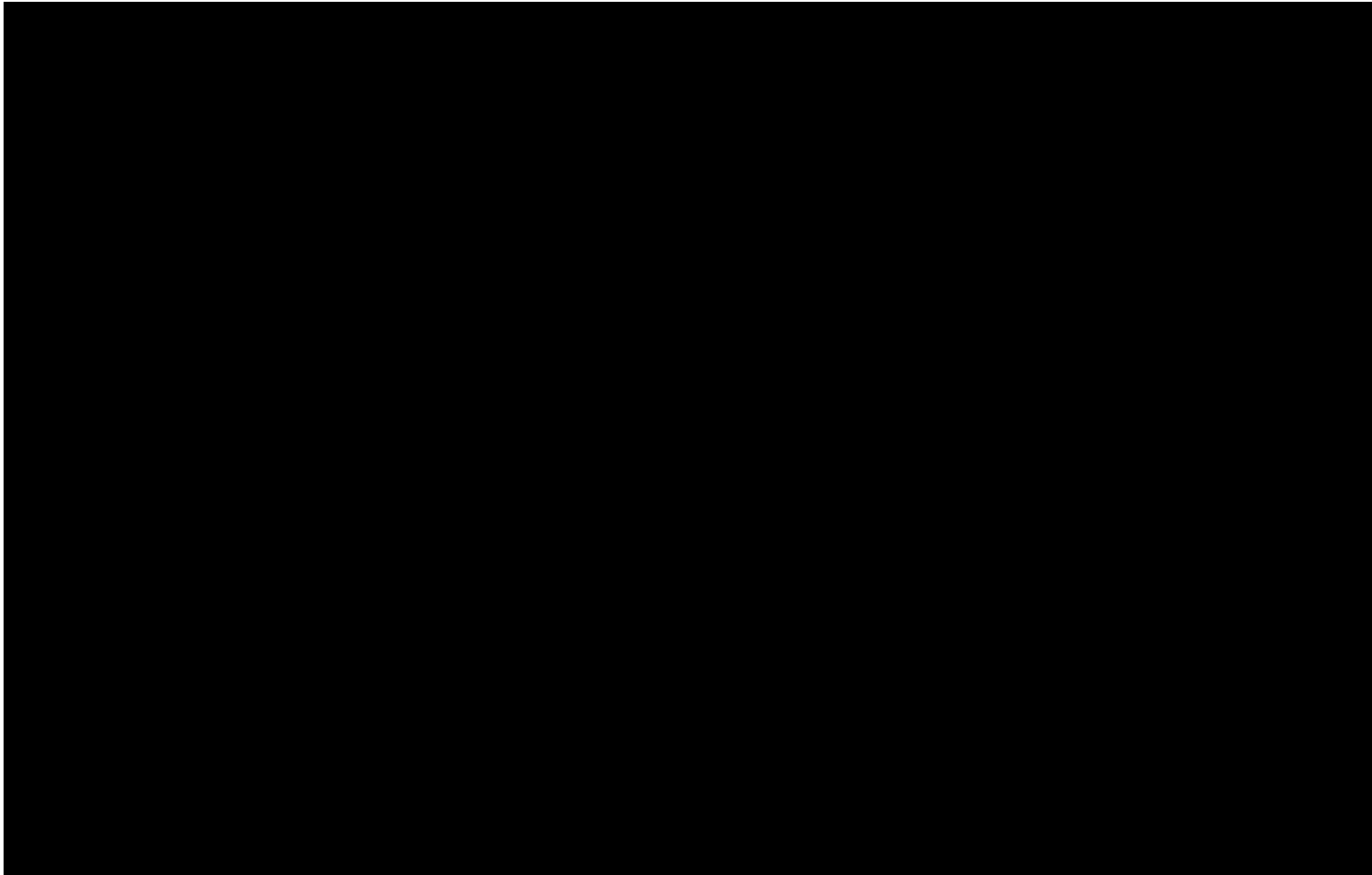
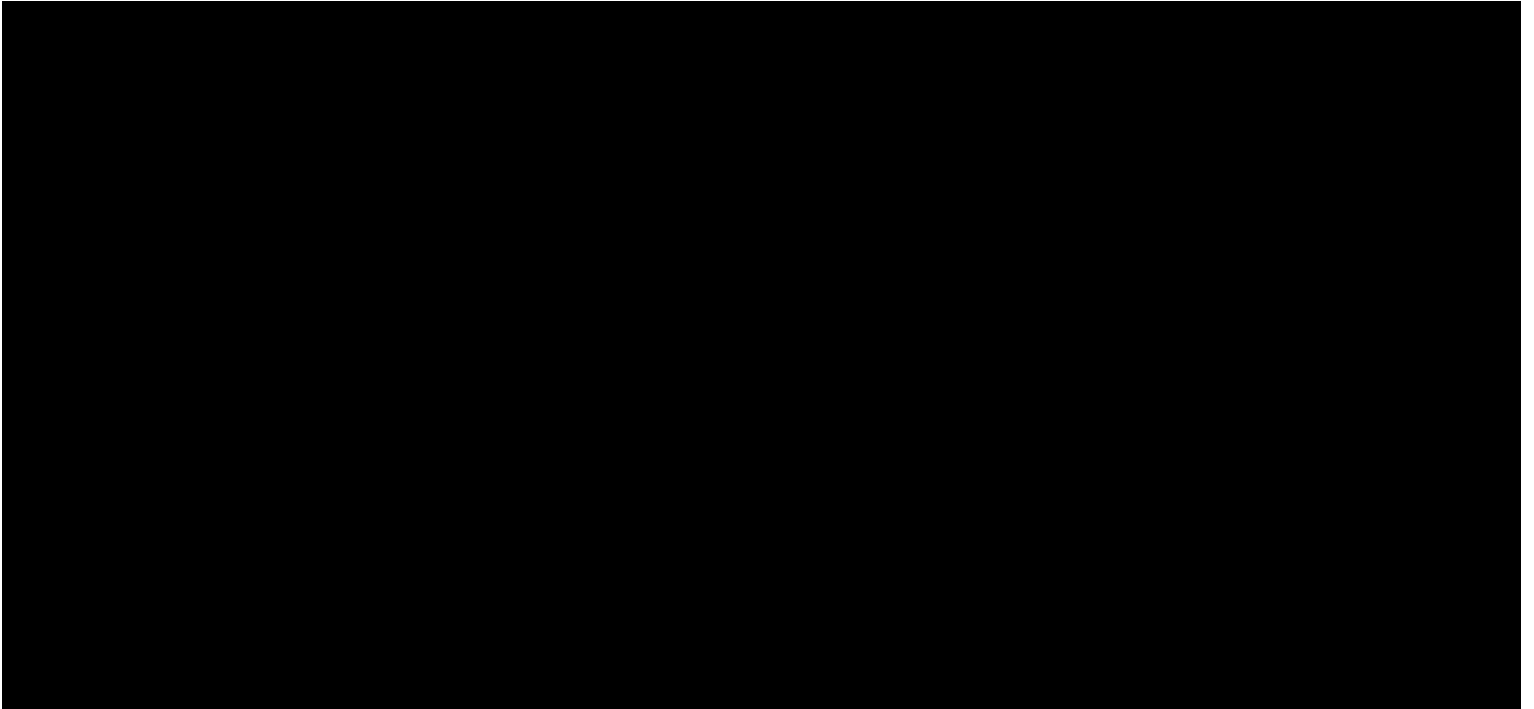


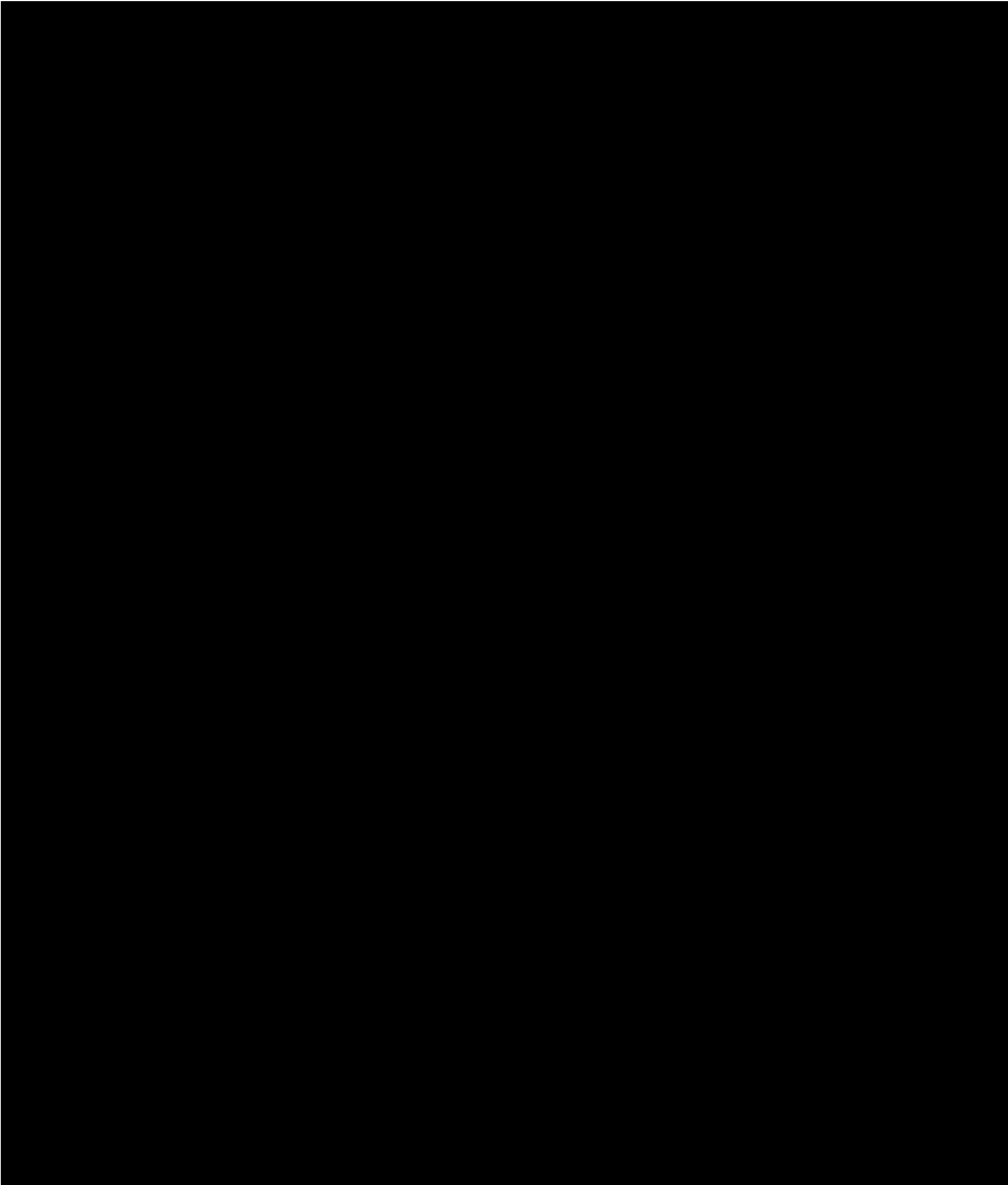


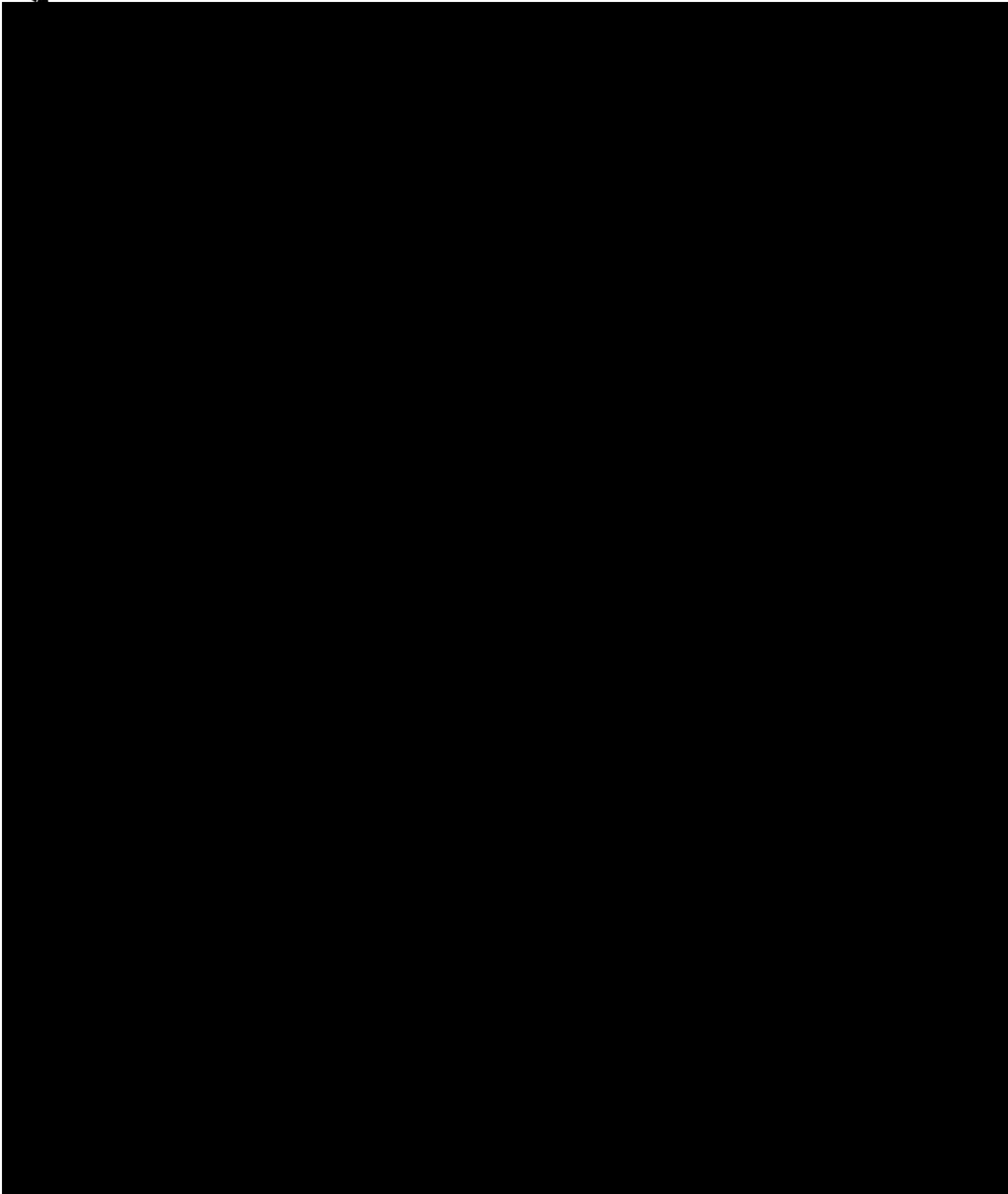


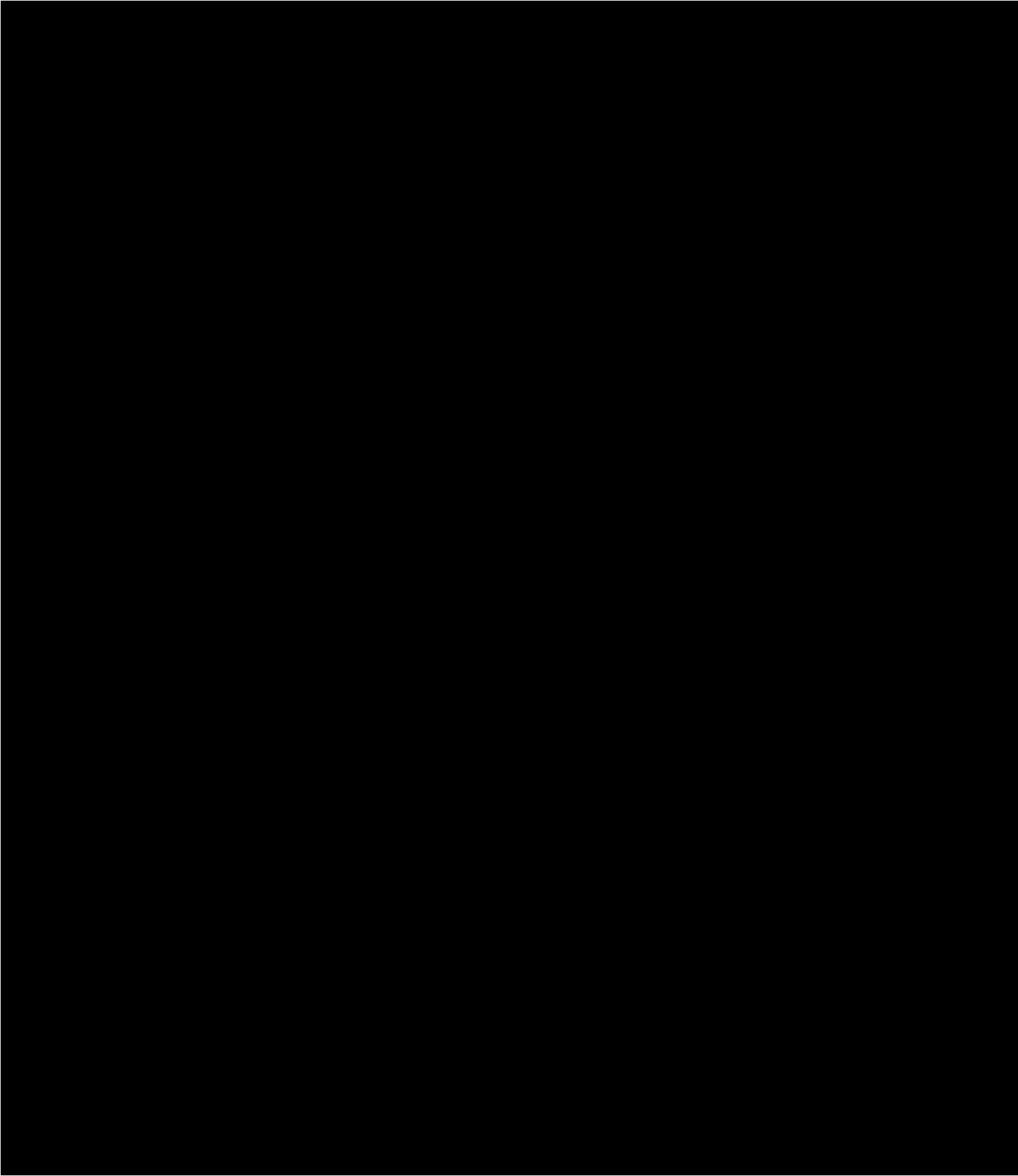


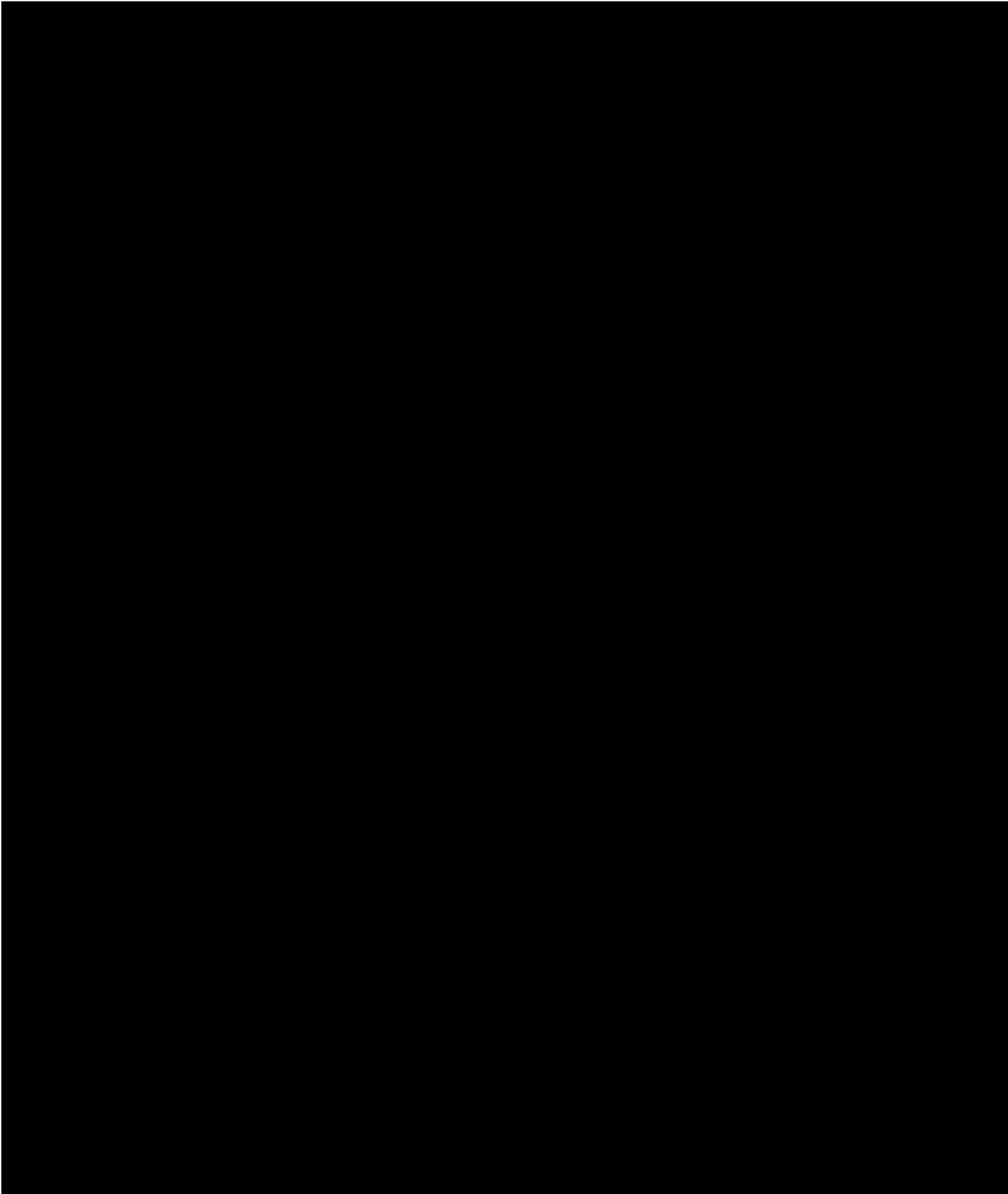


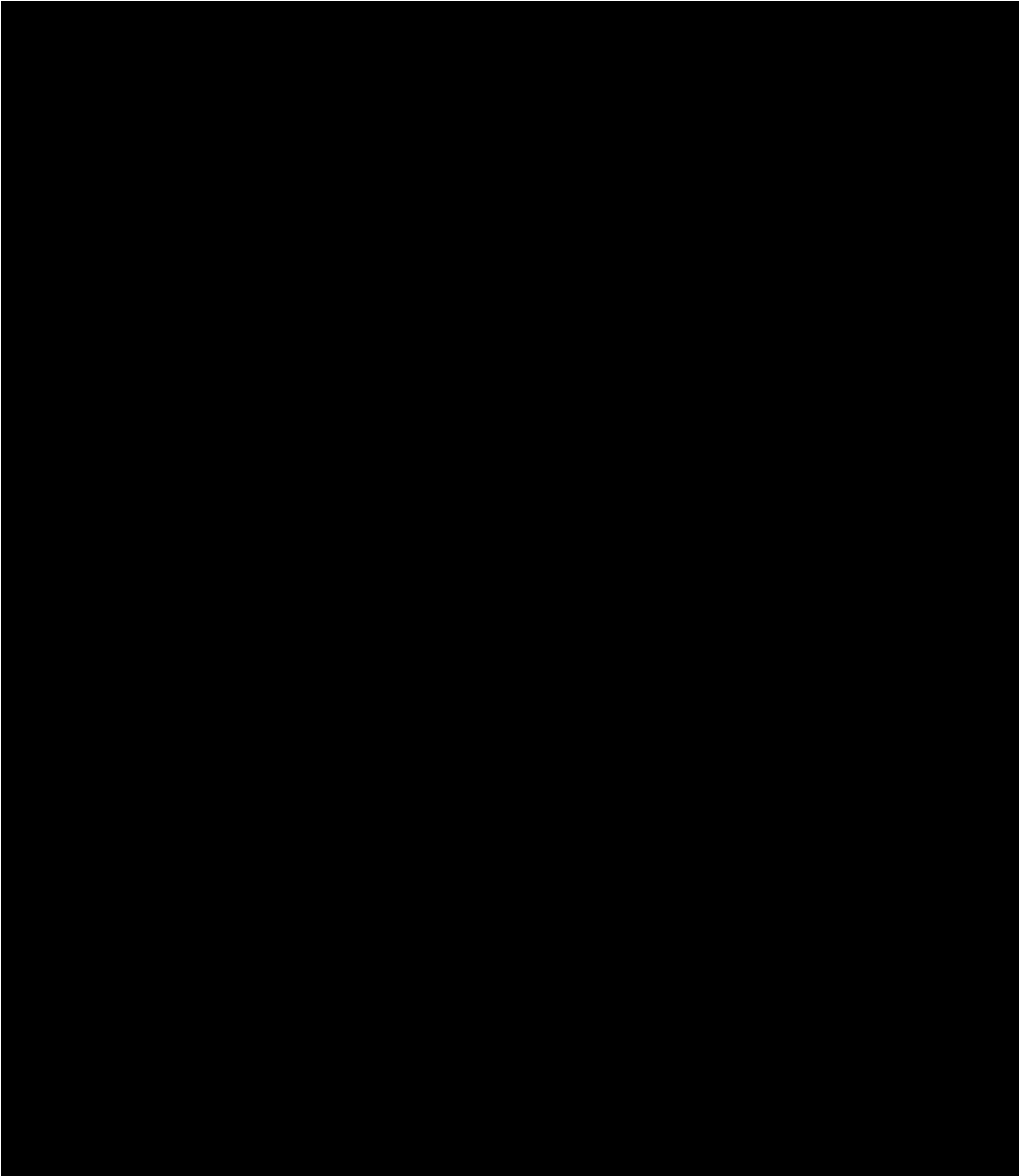


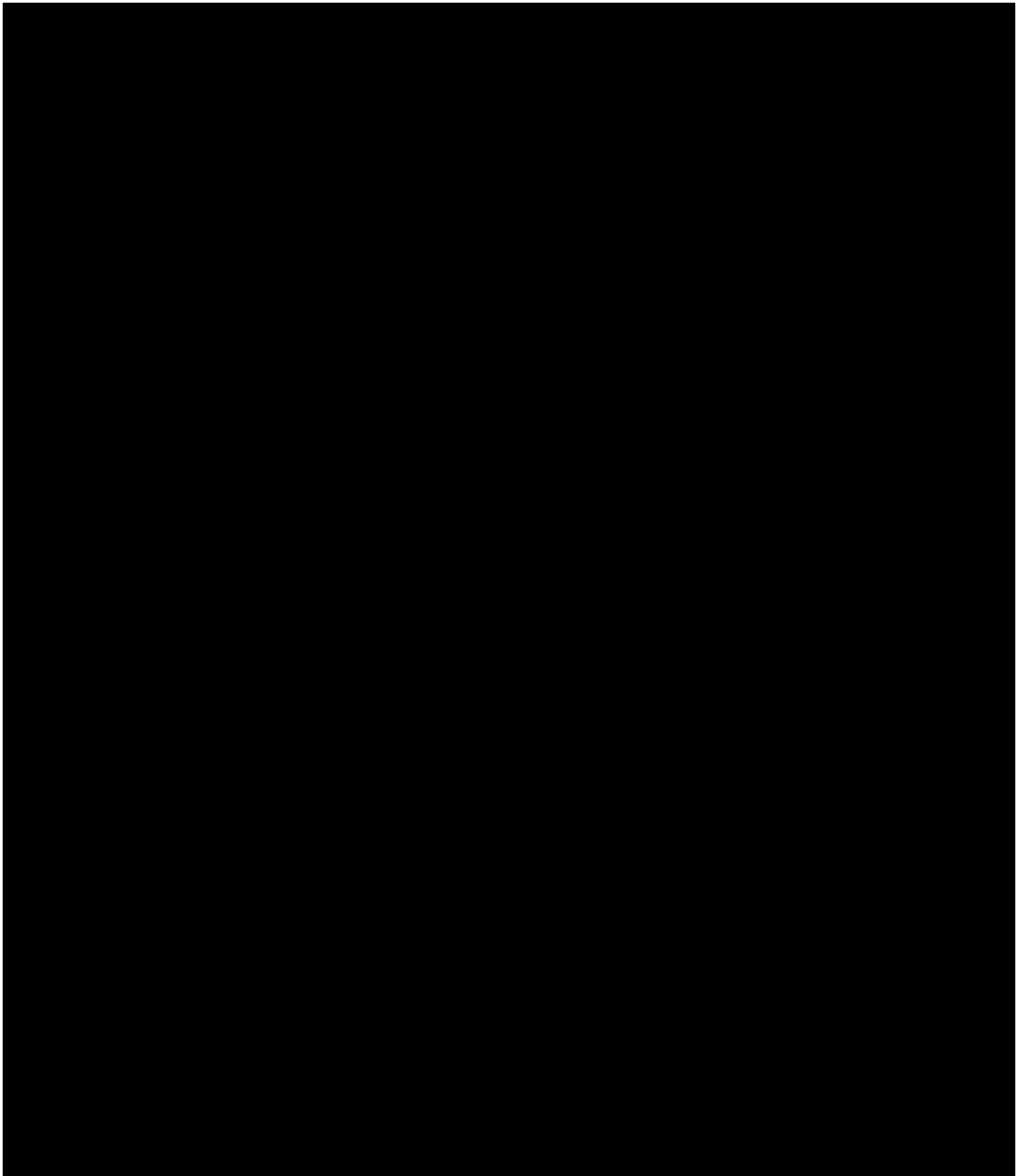














Path #2

1. If the actions defined by Path #1 ARE NOT taken, DrJ, at the timing of its choosing, will perform the work necessary to meet all of its professional engineering obligations.
2. IP-LLC and Qualtim, at the time of their choosing, will take all actions deemed necessary to preserve and protect the value of its businesses and any related fiduciary obligations that I have with respect to each business involved.

If Path 2 is chosen, the liability for this choice will be determined at some future date.

From: Winky Glover <winky@glovergdnj.com>

Unless Path #1 is implemented, this will likely be our last communication.

A handwritten signature in cursive script, appearing to read "Kirk Grundahl".

Kirk Grundahl, P.E. (47 states)
President
608-217-3713

PS Please note that nothing contained in this letter, nor any act or omission to act by IP-LLC and/or Qualtim, is intended or should be deemed a waiver or modification of any rights or remedies that IP-LLC and/or Qualtim may have at law or in equity, and all such rights are expressly reserved.



¹ <https://www.dictionary.com/browse/software>, Software, Computers. The programs used to direct the operation of a computer, as well as documentation giving instructions on how to use them. Similarly, <https://www.dictionary.com/browse/calculator>; Calculator; A person who [calculates](#) or computes; Also called [calculating machine](#); A small electronic or mechanical device that performs [calculations](#), requiring manual action for each individual operation; a person who operates such a machine.

² <https://www.dictionary.com/browse/calculate>, Calculate; To determine or ascertain by mathematical methods; Compute; <https://www.dictionary.com/browse/calculation>; Calculation, the act or process of calculating; Computation; The result or product of calculation; An estimate based on the known facts; forecast.

³ <https://www.dictionary.com/browse/automation>, Automation, The technique, method, or system of operating or controlling a process by highly [automatic](#) means, as by electronic devices, reducing human intervention to a minimum. A mechanical device, operated electronically, that functions [automatically](#), without continuous input from an operator.

<https://www.dictionary.com/browse/automatic>, Automatic, Having the capability of starting, operating, moving, etc., independently.

⁴ Direct evidence available upon request.

⁵ The May 23, 2023 M&M letter confirms that Paragon automated calculations and the resulting software are defined by using well-known mathematical equations, which contain no IP and TS.

⁶ Ibid

⁷ <https://www.nspe.org/resources/ethics/code-ethics>; <https://ncees.org/about/member-licensing-board-directory/>; <https://www.nspe.org/resources/licensure/licensing-boards>